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MEMO ENDORSED

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February 28, 2022

Via ECF

The Honorable Kenneth M. Karas United States District Court Judge U.S. District Court, Southern District of New York 300 Quarropas Street White Plains, New York 10601

Re: W.S.R., An Infant By And Through His Father William Richardson, and

William Richardson And Nicole Richardson, Individually v. FCA US LLC, Yanfeng US Automotive Interior Systems I LLC (a/k/a Yanfeng Automotive

Interior Systems), Adient, Plc, et al. Docket No. 7:18-cv-06961-KMK-AEK

Dear Judge Karas:

We represent Defendant FCA US LLC ("FCA"). This letter is submitted pursuant to Rule IX.A. of the Court's Individual Practices concerning confidential documents submitted as Exhibits to the Fogel Supplemental Declaration as part of FCA's Reply to Adient Plc's ("Adient"), Johnson Controls Inc.'s (JCI's) and JCIM LLC's (JCIM's) opposition to, and in further support of, FCA's Motion for Summary Judgment.

FCA US previously moved to seal documents attached to FCA's Motion for Summary Judgment which was granted by the Court on November 10, 2021. (Dkt. No. 261).

FCA subsequently moved to seal additional documents on December 22, 2021 in opposition to Summary Judgment Motions filed by the Plaintiffs and by Defendant Yanfeng Automotive Interior Systems ("YFAI") which was granted by the Court on January 3, 2022 (Dkt. No. 288).

FCA US is now filing two confidential documents. Exhibit "AI" which is a duplicate of a confidential document already subject to Your Honor's prior ruling and Exhibit "AJ" which was also previously filed under seal by Adient/Johnson Controls Inc. and subject to Your Honor's prior Order.

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To the extent necessary, we request that the Court permit us to file as sealed these duplicate confidential Exhibits Fogel "AI" and "AJ" filed under seal pursuant to the prior Orders of the Court.

Respectfully submitted,

Maureen Doerner Fogel

Maureen Doerner Fogel (MDF-0989)

cc: All counsel via ECF

Granted.

SO ORDERED

KENNETH M. KARAS U.S.D.J.

March 1, 2022 White Plains, NY